

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MAYOR AND CITY COUNCIL OF
BALTIMORE, et al.,

Plaintiffs,

vs.

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.,

Defendants

Civil Action No. 1:25-cv-458-ABA

DECLARATION OF FAITH LEACH

I, Faith Leach, declare as follows:

Background

1. I am over eighteen years old, of sound mind, and fully competent to make this declaration. I also have personal knowledge of the factual statements contained herein.
2. I am the Chief Administrative Officer of the City of Baltimore. I have served in this role since March 2023.
3. In my role, I manage the day-to-day government operations across the entire City enterprise, ensuring the effective, efficient, and equitable delivery of City services.
4. The City of Baltimore is a municipal corporation organized pursuant to Articles XI and XI-A of the Maryland Constitution, entrusted with all the powers of local

self-government and home rule afforded by those articles.

5. Baltimore is the largest city in Maryland and the thirtieth largest city in the United States.
6. Baltimore is a city of nearly 600,000 people of all backgrounds. According to the 2020 Census, 60 percent of Baltimore's population is Black, 27 percent is White, 8 percent is Hispanic or Latino, and 2.5 percent is Asian. Five percent of the City was identified by the Census as being of two or more races.
7. Among its other missions, the Baltimore City Law Department has a special responsibility to protect Baltimoreans from predatory business practices of all kinds, including misleading practices, unfair and deceptive practices, and discrimination in lending.
8. White suburbs in Baltimore and the City itself fought well into the twentieth century to maintain racial segregation in housing, including through criminal penalties imposed on Black residents who moved into designated "white" neighborhoods. Baltimore realtors were also some of the first to experiment with the egregiously discriminatory practice of "redlining."
9. Just last year, during the City's annual Civil Rights Week celebration, Baltimore hosted a panel titled "From Protest to Progress: How the Birthplace of Redlining Turned into the Black Butterfly," which discussed the history of redlining in Baltimore and the attempts by the City to reverse the effects in the community.
10. In light of its history, Baltimore takes its role enforcing consumer protections very

seriously. Beginning in 2008, for example, Baltimore sued Wells Fargo under the Fair Housing Act based on allegations that the bank had engaged in unlawful, irresponsible, unfair, deceptive, and discriminatory lending practices that resulted in foreclosures on loans in minority neighborhoods and to minority borrowers. After a protracted legal battle, the City secured a \$175 million settlement for disbursement to the affected class.


11. Historic consumer protection legislation passed in Baltimore in 2023 updated the city's consumer protection ordinance and gave the Law Department important new powers to take action against companies who harm Baltimore citizens through unfair, deceptive, and abusive practices.
12. Baltimore is devoted to enforcing these consumer protections for the benefits of its residents, but its time and resources are limited.
13. The Consumer Financial Protection Bureau's office for collecting and tracking consumer complaints maintains a database to facilitate the centralized collection of, monitoring of, and response to consumer complaints.
14. Representatives of the Baltimore's Law Department have active accounts with the CFPB consumer complaint database, which they access to understand the issues facing the people of Baltimore and to obtain information regarding potential predatory practices that affect the economic well-being of the city and its residences.
15. These representatives use the complaint database to identify and prioritize affirmative consumer-protection actions to protect Baltimoreans. Without access

to the database, the City will be less efficient in these identification and prioritization efforts. Baltimore enforcement officials will be forced to conduct additional research that will take time away from other work. And their research efforts will be less likely to yield comprehensive results than the CFPB's, given the CFPB complaint function's high visibility and the CFPB's central role in the enforcement space. As a result, individual Baltimore enforcement actions will be less effective and more resource-intensive.

16. Baltimore staff have also attended trainings put on by the CFPB to stay abreast of current issues in consumer protection and fair lending in order to be able to serve the people of the City. Without these trainings, Baltimore will have to reallocate resources to collect this information itself or identify another source.

17. In addition, CFPB's vigorous enforcement efforts and its oversight of federal consumer protection laws provides an invaluable complement to Baltimore's efforts to protect its residents from scams and abuse. Without CFPB, people in Baltimore would be more at risk of being tricked and trapped by shady financial practices, and the city would be forced to divert resources from other essential functions just to provide the same level of protection that residents enjoy now. Moreover, without the CFPB, Baltimore would be deprived of important information regarding potential predatory practices and consumer protection efforts that it has used to best serve the people in its boundaries.

Executed: February 12, 2025

By: 
Faith Leach
Chief Administrative Officer
City of Baltimore